

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

Case No. 1:18-cv-08175-ER

v.

BARRY C. HONIG, *et al.*

Defendants.

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**DECLARATION OF ADAM C. FORD IN SUPPORT OF ROBERT LADD'S  
MEMORANDUM OF LAW IN OPPOSITION TO THE SEC'S MOTION TO STRIKE  
AFFIRMATIVE DEFENSE**

I, Adam C. Ford, Esq., declare the following subject to penalties of perjury:

1. I am principal of the law firm Ford O'Brien, LLP, attorneys of record for Defendant Robert Ladd.
2. I have personal knowledge of the matters set forth below, and the exhibits annexed hereto are a true and correct copy of the document described.
3. I submit this Declaration in support of Defendant Robert Ladd's Memorandum of Law in Opposition to the SEC's Motion to Strike Affirmative Defense.
4. Attached as Exhibit A hereto is a true and correct copy of a Schedule 13G, filed pursuant to Rule 13d-1(c) by the law firm Sichenzia on behalf of Barry Honig.
5. Attached as Exhibit B hereto is a true and correct copy of an email correspondence dated July 13, 2020 from Adam C. Ford, counsel for Defendant Robert Ladd to Nancy Brown, counsel for SEC.

6. Attached as Exhibit C true and correct copy of Michael Brauser's privilege log of documents withheld from his production.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: May 18, 2021



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*Attorney for Defendant Robert Ladd*